

Angela Jae Chun, SBN 248571
ajc@cglaw.com
CASEY GERRY SCHENK
FRANCAVILLA BLATT & PENFIELD, LLP
110 Laurel Street
San Diego, CA 92101
Telephone: (619) 238-1811
Facsimile: (619) 544-9232

Attorneys for Claimant Kimberly Locke-Russell

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re
PG&E CORPORATION,
and
PACIFIC GAS AND ELECTRIC
COMPANY
Debtors.

Affects:

PG&E Corporation
Pacific Gas & Electric Company
Both Debtors

* All papers shall be filed in the Lead
Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)

Chapter 11

(Lead Case—Jointly Administered)

**ANGELA JAE CHUN's
DECLARATION IN SUPPORT OF
KIMBERLY LOCKE-RUSSELL'S
MOTION TO DEEM HER LATE-
FILED CLAIM TIMELY**

Date: March 24, 2021

Time: 10:00 a.m. (Pacific)

Place: **Telephonic Appearances Only**
United States Bankruptcy

Court: Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: December 1, 2020

1. My name is Angela Jae Chun and I have been a practicing attorney for almost fourteen years.
2. I am admitted in all courts in California including the Northern District of California from which this Bankruptcy arises.
3. I am the attorney of records for Kimberly D. Locke-Russell.

4. Ms. Locke-Russell was stationed on a Hawaii military base at the time of the Camp Fire with her husband Austin and their son Connor, who happens to be autistic.
5. Ms. Locke-Russell was very close to her family back in Paradise where she grew up. She believes that one day she would return. For example, she believed she would inherit her grandmother's home someday.
6. Ms. Locke-Russell has a genuine claim for damages against PG&E as she suffered personal property loss and emotional distress trying to find her family the day of the fire.
7. Unfortunately, Ms. Locke-Russell believed she was listed as a claimant on her parents' proof of claim already submitted to this Court.
8. When she found out, she had not been, she sought legal help on her own.
9. She desperately wishes to file a proof of claim now, but that is one considered timely.
10. Her mistaken belief about her parents' claim should not be held against her, especially since she serves overseas and attends to a special-need son. She prays the Court will grant her the relief necessary to preserve her claim and that is to deem her late-filed proof of claim timely.
11. Attached as Exhibit "A" hereto is true and correct copy of Ms. Kimberly D. Locke-Russell's Proof of Claim.

I swear under the penalty of perjury under the State of California that all the foregoing is true and correct.

s/Angela Jae Chun

ANGELA JAE CHUN